

# **PLT. EXHIBIT 14**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

ARTHUR LOPEZ, and MARK LANING,  
individually, and on behalf of themselves and  
all others similarly situated individuals,

Plaintiffs,

V.

CROSS-SELL, L.L.C., a Kentucky  
Corporation, NORTH AMERICAN  
VEHICLE INSURANCE SPECIALISTS,  
L.L.C., d/b/a NAVISS, a Missouri  
Corporation, and Doe Individuals and  
Corporations 1-100 inclusive,

Defendants.

**CLASS ACTION COMPLAINT**

CASE No:

JURY DEMAND

COMPLAINT FOR:

Violations of the Driver's Privacy  
Protection Act, 18 U.S.C. §2721 et seq.

**DECLARATION OF ARTHUR LOPEZ**

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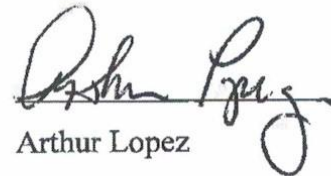
I, ARTHUR LOPEZ, make this declaration pursuant to 28 U.S.C. §1746 based upon my personal knowledge:

1. I am a United States Citizen, and an adult resident of Dallas County, Dallas Texas. I am also one of the Plaintiffs in ARTHUR LOPEZ, and MARK LANING, individually, and on behalf of a themselves and all others similarly situated individuals, v. CROSS-SELL, L.L.C., a Kentucky Corporation, NORTH AMERICAN VEHICLE INSURANCE SPECIALISTS, L.L.C., d/b/a NAVISS, a Missouri Corporation, and Doe Individuals and Corporations 1-100 inclusive;
2. I am fully familiar with the proceedings in this litigation and make this declaration in support thereof. If called to testify, I could and competently testify thereto under oath to the following:
  - a. I am a licensed driver in the State of Texas and have registered one of more vehicles with the State of Texas Motor Vehicle Department for periods which include 2012 to date;
  - b. I provided the State of Texas Motor Vehicle Department personal information, as required by law, in order to register one or more vehicles with the State of Texas Motor Vehicle Department for periods which include 2012 to date;
  - c. I provided my personal information to the State of Texas Motor Vehicle Department with the understanding that my personal information would not be released to any unauthorized person or company;
  - d. I am concerned about my personal privacy and security, and that of my family, if my personal information provided to the State of Texas Motor Vehicle Department were to be released to unauthorized persons or companies;
  - e. I did not authorize, written express or otherwise, CROSS-SELL, L.L.C., or NORTH AMERICAN VEHICLE INSURANCE SPECIALISTS, L.L.C., d/b/a NAVISS, or any person or entity associated with these parties, to obtain, re-disclose and/or re-sell any of my personal information I provided, or is contained within my motor vehicle records with the State of Texas Motor Vehicle Department;

- f. I received a solicitation letter from "Vehicle Administration Center" an affiliate of NORTH AMERICAN VEHICLE INSURANCE SPECIALISTS, L.L.C., d/b/a NAVISS which included my vehicle information;
- g. I had no prior business relationship with "Vehicle Administration Center" an affiliate of NORTH AMERICAN VEHICLE INSURANCE SPECIALISTS, L.L.C., d/b/a NAVISS, nor CROSS-SELL, L.L.C.;
- h. I find the obtainment, re-disclosure, and/or re-sale of my motor vehicle record information by "Vehicle Administration Center" an affiliate of NORTH AMERICAN VEHICLE INSURANCE SPECIALISTS, L.L.C., d/b/a NAVISS, nor CROSS-SELL, L.L.C., and any other similar entities, information I provided to the State of Texas Motor Vehicle Department, to be a privacy violation, security risk, and risk of harm to myself and my family.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 24, 2016, in Houston, Texas.

Dated: June 24, 2016

  
Arthur Lopez